

**Exhibit 6: Analysis of Defendants' "Fees for Drafting Complaint"**

Date	Name	Ds' Est. Time	Actual Time	Lodestar Rate	Fees at Lodestar Rate	Description	Notes
11/4/13	Speir	0.1	0.1	\$420	\$42.00	Office conference with Mr. Nussbaum regarding complaint, motion for preliminary injunction, and deadlines.	
11/18/13	Speir	5.8	5.8	\$420	\$2,436.00	Review complaints in Reaching Souls v. Sebelius and Christian Brothers v. Sebelius; prepare notes and outline in preparation for complaint on behalf of Catholic Benefits Association; conduct related research on limited cooperative associations, proper venue, and similarities and differences among Catholic Benefits Association, GuideStone Financial Resources, and Christian Brothers Investment Services. Phone conference with Rod Miller, GuideStone general counsel, regarding GuideStone's lawsuit, status of GuideStone's plan, and constitutional, statutory, and regulatory issues.	
11/19/13	Speir	1.8	1.8	\$420	\$756.00	Review complaints in various other HHS mandate cases; prepare notes and outline in preparation for complaint on behalf of Catholic Benefits Association.	
11/20/13	Speir	2.5	2.5	\$420	\$1,050.00	Draft Complaint.	
11/21/13	Speir	1.7	1.7	\$420	\$714.00	Draft complaint. Review free exercise decision from Southern District of New York on NYPD no-beards policy (Litzman v. NYPD).	
12/23/13	Speir	4.8	4.8	\$420	\$2,016.00	Research on associational standing, venue, and other issues impacting the location, claims, and strategy of litigation; correspondence with Mr. Nussbaum and others regarding same. Draft complaint.	
12/26/13	Speir	10.4	10.4	\$420	\$4,368.00	Draft complaint.	
12/27/13	Nussbaum	0.3	0.3	\$610	\$152.50	Conference with Mr. Speir re issues standing party and other issues related to the drafting of the complaint.	
12/27/13	Speir	14.3	14.3	\$420	\$6,006.00	Draft complaint.	
1/7/14	Speir	1.3	<b>0.8</b>	\$420	\$336.00	Office conference with Messrs. Nussbaum and Mahaffey <b>to review, discuss, and revise membership application</b> , to discuss draft complaint and litigation strategy, <b>and to discuss recent developments in other CASC litigation</b> .	
2/14/14	Speir	0.4	<b>0.2</b>	\$420	\$84.00	Office conference with Mr. Nussbaum regarding timeline for filing <b>complaint and preliminary injunction motion</b> and contents of both.	
2/17/14	Speir	7.9	7.9	\$420	\$3,318.00	Research facts relevant to selected plaintiffs; draft and revise complaint. Office conference with Mr. Nussbaum to discuss potential plaintiffs and possibility of class action.	
2/18/14	H William Ma	1.1	1.1	\$610	\$671.00	Review complaint. Office conference with Messrs. Nussbaum and Speir re associational standing issues and named parties.	

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2/18/14	Speir	5.4	5.4	\$420	\$2,268.00	Research facts relevant to selected plaintiffs; draft and revise complaint.	
2/22/14	Nussbaum	3.3	<b>2.3</b>	\$610	\$1,403.00	Legal research re sub-class certification. Outline checklist for complaint. <b>Review adverse 7th Circuit decision in Notre Dame case. Review D.Okla. decision in Guidestone case.</b>	
2/24/14	Speir	11.1	<b>0.5</b>	\$420	\$210.00	<b>Draft preliminary injunction. Office conference with Messrs. Nussbaum and Plachy regarding class certification and need for subclasses corresponding to different groups of employer members; office conference with Messrs. Nussbaum and Kniffin regarding various issues in case, including class certification, venue, complaint, and motion for preliminary injunction.</b>	
2/25/14	Speir	6.9	<b>2.2</b>	\$420	\$924.00	<b>Draft preliminary injunction). Phone conference with Mr. Nussbaum and Mr. Kinkopf regarding Archdiocese's membership and potential plaintiff status. Office conference with Messrs. Nussbaum and Mahaffey regarding issues of church plans and impact on standing and burden in litigation; correspondence with Mr. Nussbaum regarding same. Revise and draft complaint.</b>	
2/26/14	Speir	7.2	<b>3.2</b>	\$420	\$1,344.00	<b>Revise and draft complaint. Phone conference with Rich Hoepling regarding Good Will Publishers, plan information, and participation in lawsuit; office conference with Mr. Nussbaum regarding same. Office conference with Mr. Kniffin regarding draft motion for preliminary injunction.</b>	
2/27/14	Speir	4.7	<b>2.4</b>	\$420	\$1,008.00	<b>Revise and draft complaint. Revise and draft motion for preliminary injunction.</b>	
2/28/14	Speir	5.0	<b>1.5</b>	\$420	\$630.00	<b>Review and organize correspondence from Mr. Nussbaum, Mr. Hoepling, Ms. Eason, and Ms. Matthews regarding litigation, venue, and other matters. Draft motion for preliminary injunction. Draft and revise complaint.</b>	
3/1/14	Nussbaum	6.5	<b>6.2</b>	\$610	\$3,782.00	<b>Review email from Archbishop Lori. Email to Archbishop Lori re doctrinal analysis. Continue drafting and revising complaint.</b>	
3/3/14	Nussbaum	6.0	<b>5.6</b>	\$610	\$3,416.00	<b>Continue drafting and revising complaint. Conference with Messrs. Speir and Kniffen re same and re issues related to the motion and brief for class certification.</b>	

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3/3/14	Kniffin	4.0	<b>2.3</b>	\$440	\$1,012.00	Read and edit draft complaint; <b>conversation with Messrs. Nussbaum and Speir</b> re strategy and timing of complaint, <b>preliminary injunction motion, motion for class certification; and draft motion for class certification.</b>	
3/4/14	Nussbaum	4.0	<b>3.6</b>	\$610	\$2,196.00	Outline complaint issues and begin revision of same. <b>Phone conference with Chuck Wade, chair of Catholic Charities of Oklahoma City re the lawsuit.</b>	
3/5/14	Nussbaum	7.5	7.5	\$610	\$4,575.00	Analyze factual issues re each plaintiff. Gather additional facts re same. Revision of complaint. Research standing and procedural issues. Review Oklahoma local rules.	
3/5/14	Kniffin	8.0	0.8	\$440	\$352.00	Meeting with Messrs. Mahaffey, Speir and Nussbaum re complaint and case strategy; <b>legal research, draft and edit motion for class certification.</b>	
3/6/14	H William Ma	4.5	4.5	\$610	\$2,745.00	Review and revise complaint.	
3/6/14	Nussbaum	4.8	<b>3.8</b>	\$610	\$2,318.00	Phone conference with Jeanne Gorman re issues related to Villa St. Francis. <b>Email to Noel Francisco re lawsuit. Phone conference with communications committee.</b> Conference with Messrs. Speir and Kniffin re revision of complaint and next steps. Continue revising complaint.	
3/6/14	Speir	12.2	<b>7.2</b>	\$420	\$3,024.00	<b>Correspondence with Mr. Kincoff and Mr. Hoefling regarding complaint; review letters from Mr. Gallagher to board and employees of Good Will regarding objections to Mandate. Draft engagement letters to named plaintiffs.</b> Review complaint; conferences with Messrs. Nussbaum and Kniffin regarding same.	
3/6/14	Kniffin	6.3	<b>2.8</b>	\$440	\$1,232.00	<b>Edit motion for class certificaiton;</b> read and submit comments on draft complaint; meetings with Messrs. Mahaffey, Nussbaum and Speir re complaint, timing, and strategy.	
3/6/14	Kniffin	0.5	0.5	\$440	\$220.00	Read emails, phone calls with Mr. Speir regarding changes to complaint.	
3/7/14	H William Ma	1.1	1.1	\$610	\$671.00	Review and office conference re complaint.	

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3/7/14	Nussbaum	5.3	<b>3.3</b>	\$610	\$2,013.00	Conference with Mr. Speir re revision of complaint. <b>Voice mail message to [Redacted]. Voice mail message to Angela Ables re pro hac vice motion. Phone conference with Bill Baird re banking issue.</b> Continue to draft and revise complaint. <b>Phone conference with Angela Ables re pro hac vice motion, edits, entry of Mr. Blasingame's appearance and other issues.</b> Exchange email messages with David Kinkopf re allegation as to the Archdiocese of Baltimore's grandfather status. <b>Phone conference Noel Francisco re litigation issues.</b>	
3/7/14	Speir	6.8	<b>4.8</b>	\$420	\$2,016.00	Draft/review complaint; conferences with Messrs. Nussbaum, Mahaffey, Kniffin, and Dyer regarding same; correspondence with clients and counsel regarding same. Phone conference with Mr. Hoeftling regarding complaint; <b>phone conference with Mr. Nussbaum and Noel Francisco regarding case and litigation strategy.</b> Prepare civil case cover sheet; research and compile forms and information needed for pro hac vice admission, notice of constitutional question, and corporate disclosure statement; correspondence with Messrs. Nussbaum and Kniffin regarding same.	
3/10/14	Nussbaum	6.8	<b>2.8</b>	\$610	\$1,708.00	Attention to file. Outline documents and tasks to complete filing. Email to Angela Ables re same. Email to Bob Gallagher seeking signed verification. <b>Voice mail message to Rich Hoeftling re same.</b> Review and revise complaint, especially sections re burden on Group I and II employers, and religious classification scheme. <b>Continue drafting and revision of brief in support of motion for preliminary injunction.</b>	
3/10/14	Speir	6.9	<b>2.4</b>	\$420	\$1,008.00	Attention to correspondence among Mr. Nussbaum, Ms. Matthews, and me pertaining to number and geographic diversity of members; correspondence with Mr. Kniffin regarding same. Attention to requests for letters of good standing from applicable bars and courts for purposes of pro hac vice admission. Draft and revise motion for preliminary injunction. Draft and revise complaint.	
3/10/14	Kniffin	3.5	<b>0.8</b>	\$440	\$352.00	Read draft complaint and preliminary injunction, edit motion for class certification.	

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3/11/14	Speir	4.6	<b>2.3</b>	\$420	\$966.00	Perform final edits to complaint and prepare for filing; conferences with Mr. Nussbaum regarding same. <b>Draft corporate disclosure statement; attention to summons and ECF registration. Draft separate motion for preliminary injunction; conference and correspondence with Messrs. Nussbaum and Kniffin regarding same.</b>	
3/12/14	Nussbaum	7.5	<b>3.7</b>	\$610	\$2,257.00	Continue drafting, revising, and addressing numerous issues related to complaint, <b>motion for preliminary injunction, related brief, and other filings.</b> Numerous conversations with Mr. Speir.	
<b>TOTALS:</b>		<b>202.6</b>	<b>135.2</b>		<b>\$65,599.50</b>		